

RESPONSE OF RECKITT BENCKISER INC.
TO USEPA'S REQUEST FOR INFORMATION
REGARDING THE BERRY'S CREEK STUDY AREA
BERGEN COUNTY, NEW JERSEY

Reckitt Benckiser Inc. ("Reckitt Benckiser") submits this response to the Request for Information ("Request") of the United States Environmental Protection Agency ("USEPA" or the "Agency") purportedly under the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation & Liability Act, 42 U.S.C. §§ 9601 et seq. ("CERCLA") regarding the Berry's Creek Study Area, Bergen County, New Jersey (the "Site"). Reckitt Benckiser makes this response (i) without admitting any liability or any issue of law or fact; (ii) without admitting that any hazardous substance was released or deposited by Reckitt Benckiser at the Site; and (iii) without prejudice to any position Reckitt Benckiser may take in connection with the Site or any action or proceeding related to the Site in the future.

Reckitt Benckiser has searched the records it considers most likely to contain information responsive to the Agency's Request, and similarly has contacted those current employees it considers most likely to provide such responsive information. However, the documents obtained from the State of New Jersey on microfilm have not been reviewed completely and additional documentation within the company may exist. Therefore, Reckitt Benckiser cannot categorically state that it has not inadvertently overlooked some piece of information or a document that the Agency may consider responsive in whole or in part to its Request or which may cause Reckitt Benckiser upon discovery of such information to supplement, modify or revise any of its responses herein. Accordingly, Reckitt Benckiser reserves the right to supplement, modify and revise any of its responses to the Request set forth below.

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Reckitt Benckiser further objects to the Agency's Request on the following grounds:

1. Reckitt Benckiser objects to each of the Agency's Requests to the extent they purport to require Reckitt Benckiser to state or disclose information protected by the attorney-client or attorney work product privileges. Accordingly, Reckitt Benckiser will not state or disclose an such information nor produce any privileged documents in response to this Request.

2. Reckitt Benckiser objects to producing an formulaic or other such proprietary information or documents because such information or documents, when the substance, as compared to the amount, is disclosed is not relevant to alleged releases to the Berry's Creek Study Area.

3. Reckitt Benckiser objects to providing documents that were deemed confidential when originally submitted to USEPA in connection with programs other than CERCLA remediation.

4. Reckitt Benckiser objects to the Instructions For Responding To Request For Information as unauthorized by §104(e) of CERCLA, overbroad and unnecessary to obtaining responsive information within the proper scope of §104(e) of CERCLA, impermissibly vague and arbitrary, capricious and unreasonable, and without limiting the generality of the foregoing, Reckitt Benckiser specifically objects to the direction to consult with "former employees and agents of your company whom ... may be familiar with the matter to which the question pertains" and to identify any source of information consulted in the preparation of this response.

5. Reckitt Benckiser Inc. objects to the definition of "the company" or "your company" to include, in effect, every related entity whether or not that entity operated the Airwick Industries property as irrelevant and as burdensome.

Subject to and without waiving the foregoing, Reckitt Benckiser hereby responds to the Agency's Request as follows:

RESPONSE TO REQUEST FOR INFORMATION

1. a. State the correct legal name and mailing address of your Company.

Reckitt Benckiser Inc., 1655 Valley Road, Wayne, New Jersey 07470

- b. Identify the legal status of your Company (corporation, partnership, sole proprietorship, specify if other) and the state in which your Company was organized or formed.

Reckitt Benckiser Inc. is a Delaware Corporation. It was incorporated in Delaware on June 10, 1977, under the name Reckitt & Colman, North America, Inc.

- c. State the name(s) and address(es) of the President, Chairman of the Board, and the Chief Executive Officer of your Company,

Kenneth R. Stokes, Reckitt Benckiser Inc., 1655 Valley Road, Wayne, New Jersey 07470

- d. If your Company is a subsidiary or affiliate of another corporation, or has subsidiaries, identify each such entity and its relationship to your Company, and state the name(s) and address(es) of each such entity's President, Chairman of the Board, and Chief Executive Officer.

Reckitt Benckiser Inc. objects to the question above as it relates to entities other than Reckitt Benckiser Inc. as irrelevant as there are no allegations affecting any entities related to Reckitt Benckiser Inc., and as burdensome. Without waiving its objection Reckitt Benckiser states that the following list sets forth the parent corporations of Reckitt Benckiser Inc. and indicates the country of Incorporation of each parent corporation. Each entity in the list owns all the outstanding shares of capital stock of the next following entity unless otherwise noted (e.g., Reckitt & Colman Chiswick (OTC) Ltd. owns all the shares of Reckitt Colman Holdings Ltd., which in turn owns approximately 75% of the shares of Reckitt Benckiser Holdings BV):

Reckitt Benckiser plc (England) (CEO – Bart Becht, Address - 103-105 Bath Road, Slough, Berkshire SL1 3UH, England)
Reckitt & Colman (Jersey) Ltd. (Jersey)
Reckitt & Colman Chiswick (OTC) Ltd. (England)
Reckitt & Colman Holdings Ltd. (England) (approx. 75%)
Reckitt Benckiser Holdings BV (Holland) (approx. 78%)

Reckitt Benckiser NV (Holland) (80%)
R&C Holdings BV (Holland)
RB Holdings (Luxembourg) Sarl (Luxembourg)
Reigate Square Holdings Sarl (Luxembourg)
Ashford Square Holdings Sarl (Luxembourg)
RB Holdings (USA) Inc. (U.S.A: Delaware) (President - Kenneth R. Stokes,
Address – 1655 Valley Road, Wayne, NJ 07470)
Wayne Valley Holdings Inc. (U.S.A: Delaware) (President - Jeffrey Carr, Address
– 1655 Valley Road, Wayne, NJ 07470)
Reckitt Benckiser Inc. (USA: Delaware)

Reckitt Benckiser Inc. has the following direct, wholly-owned subsidiaries:

Linden Corporation: Delaware corporation, 1105 North Market Street, Suite #1218, Wilmington, Delaware 19899; President: Phil Hibbert; date of Incorp.: December 1, 1994

Reckitt & Colman Subsidiary Corporation: Delaware corporation, 1105 North Market Street, P.O. Box 8985, Wilmington, Delaware 19899; President: Phil Hibbert; date of incorp.: June 20, 1990

Reckitt Benckiser Pharmaceuticals Inc.: Delaware corporation, 1909 Huguenot Road, Richmond, Virginia 23235; President: Charles O'Keeffe; date of incorp.: December 11, 1997

- e. Identify the state and date of incorporation and the agent for service of process in the state of incorporation and in the State of New Jersey for your Company and for each entity identified in your response to question 1.d., above.

Reckitt Benckiser Inc. objects to the question above as it relates to entities other than Reckitt Benckiser Inc. as irrelevant as there are no allegations affecting any entities related to Reckitt Benckiser Inc., as burdensome and as calling for information that can be determined on a company by company basis by reviewing public documents. Without waiving these objections, Reckitt Benckiser Inc. states that if the Agency requires further information in this regard, please contact the undersigned. Reckitt Benckiser further states that its state and date of incorporation is stated in responses above and that CT Corporation serves as the agent for service of process for Reckitt Benckiser Inc. (Corporation Trust Company, 820 Bear Tavern Road, West Trenton, NJ 08628.)

- f If your Company is a successor to, or has been succeeded by another entity, identify such other entity and provide the same information requested in question 1.e., above.

Reckitt Benckiser Inc. objects to the question above as it relates to entities other than Reckitt Benckiser Inc. as irrelevant as there are no allegations affecting any entities related to Reckitt Benckiser Inc. and as burdensome. Without waiving its objections, Reckitt Benckiser Inc. states that on December 31, 1988, Airwick Industries, Inc. and Durkee-French Foods, Inc. (formerly known as The R.T. French Company) were merged with and into Reckitt & Colman, North America, Inc. (incorporated in Delaware in 1977), which changed its name to Reckitt & Colman Inc. on January 3, 1989. In a transaction that closed on June 29, 1990, Reckitt & Colman plc acquired numerous assets and businesses of American Home Products Corporation, including the stock of the two Boyle-Midway companies, which became wholly-owned subsidiaries of Reckitt & Colman Inc. On November 2, 1996, Boyle-Midway, Inc. and Boyle-Midway Household Products, Inc. were merged with and into Reckitt & Colman Inc. On February 1, 2000, Benckiser Consumer Products Inc., a Delaware corporation, and its wholly-owned subsidiary RCN Product, Inc., a Delaware corporation, were merged with and into Reckitt & Colman Inc., which changed its name to Reckitt Benckiser Inc. as of the same date.

2. Provide a description of the Site, i.e. the property or properties in Carlstadt, Bergen County, New Jersey, which your Company owned or owns, or upon which it operated or leased, or currently operates or leases. Include Block and Lot numbers, names of streets or physical features bounding the property(ies), and acreage.

Reckitt Benckiser Inc. objects to this question to the extent it modifies the term "Site" as used in B.1 of the Definitions section to this Request for information. As to 111 Commerce Road, it is located at Lots 4 and 5, Block 127 of the Borough of Carlstadt in the County of Bergen. As to 179 Commerce Street, it is located at Lot 4, Block 179 of the Borough of Carlstadt in the County of Bergen. It is believed that the Carlstadt property utilized for operations was approximately six acres in size.

3. Provide a narrative description of the nature of the Company's business. If the nature of the Company's business changed over time, please explain how it changed, (including any name changes) and approximately when the changes occurred.

As to Reckitt Benckiser Inc., see attached company history from its webpage. As to Airwick Industries Inc. and later the Airwick Division of Reckitt & Colman Inc., see the response to question 5.

4. Please specify the time period during which the Company leased, owned, and/or operated the Site. If the Company leased, owned or operated at portions of the Site, specify the time periods of such involvement, and appropriate block and lot numbers. If your Company ever leased the Site, provide copies of leases, names, current addresses and telephone numbers of each owner of the Site during the period the Company leased the Site.

See the response to question 5. 145 Commerce Street was leased from 145 Commerce Road Associates which last known address was 145 Commerce Street, Carlstadt, NJ 07072. 111 Commerce Street was owned by Airwick Industries Inc. and was transferred to Reckitt & Colman Inc. on July 15, 1991 and then to HYA PAL Realty Corp. on July 23, 1991. As to 179 Commerce Street, owners after the building was constructed in 1965 were Kenilworth Management Company (12/17/65 – 6/21/71, 8/10/71 – 1/20/75), Airline Construction Corporation (6/21/71 – 8/10/71, 1099 Associates/Mystic Properties Corporation (Partnership)(1/20/75 – 3/31/83), 179 Commerce Associates whose last known address was 601 Commercial Avenue, Carlstadt 07072 (3/31/83 - ?). The lease of that property to Reckitt & Colman was terminated on February 14, 1997.

5. Describe the Site at the time the Company took possession of it. If there was any business at the Site, explain the nature of that business.

At the time Reckitt & Colman Inc. acquired the stock of Airwick Industries, Inc. ("Airwick Industries") from Ciba Geigy Corporation in 1985, Airwick Industries was in the business of 1) manufacturing air-freshening and cleaning products for the consumer market 2) manufacturing cleaning products for the institutional maintenance market and 3) packaged consumer goods assembly. Air-freshening and cleaning products included detergents, disinfectants, odor counteractants, floor care products, carpet cleaners, insecticide, and others. Consumer goods assembly included oral aerosol and drops. Product production took place at 111 Commerce Road (believed to have started no earlier than 1962) where liquid blending and powder blending (manually fed batch mixing) of raw materials purchased on the open market and the filling of retail containers took place. Also in this building were the office operations including, at times, the company or division executive group, finance, purchasing, planning, etc. from at least as early as 1974 until approximately 1989. A maintenance shop and quality laboratories (which may have included bench scale pilot plant testing) were also located at 111 Commerce Road.

179 Commerce Road was constructed in 1965 and was operated by Matchbox for plastic injection molding operations until 1971. From 1971 through 1990, Airwick operations used it for polypropylene and polyethylene molding utilizing hydraulically powered machines. At times this building also was used for laboratory and pilot plant purposes. 145 Commerce Road was used for storage of raw materials and packaging.

At the time Reckitt & Colman Inc. acquired the stock of Airwick Industries from Ciba Geigy Corporation in 1985, it is believed there were six underground storage tanks at the site (two in-use heating oil tanks, one 10,000 and the other 12,000 gallons; one out of service 10,000 gallon heating oil tank; and 2 – 1,500 gallon tanks and 1 – 1,000 gallon tank used for isopropyl alcohol and petroleum hydrocarbon storage). It is believed the out-of-service heating oil tank and these three smaller tanks were removed in connection with ECRA Case #85195. An underground tank for ethanol only was added after Reckitt & Colman Inc.

acquired the stock of Airwick Industries. That tank, and the two in-use heating oil tanks in connection with ECRA Case #90648, were removed in 1991.

Wastewater from blending operations was sent to a publicly owned water treatment works from approximately 1965 until cessation of operations. From the commencement of operations until 1965, sanitary and industrial wastewater went to a septic/drywell system. At 179 Commerce, all sanitary wastes, floor drains, sinks and sumps ultimately reached an unstained and uncracked central sump which was pumped to the sanitary sewer.

Plant operations ceased at 111 Commerce Road on September 10, 1990 and storage operations stopped on or about the same time at 145 Commerce Road. Molding operations at 179 Commerce Road ceased on December 3, 1990. Pesticide formulation and testing, household cleaning products formulation and testing, food product formulation and product packaging testing activities moved into 179 Commerce Road thereafter but ceased on or about February 1, 1997.

6. Describe in detail the nature of the relationship between the Company and each of the following entities: (1) Ciba-Geigy; (2) Reckitt & Colman. Indicate the time and manner in which the relationships were established. Specifically address the relationships as pertaining to any current or past operations or ownership at the Site.

In 1985, Reckitt & Colman Inc. purchased the stock of Airwick Industries, Inc. (formerly, until 1968, Airkem, Inc., a New York Corporation) from Ciba Geigy Corporation making Airwick Industries, Inc. a wholly owned subsidiary of Reckitt & Colman, Inc. On December 22, 1988, Airwick Industries, Inc. merged into Reckitt & Colman Inc. in effect becoming a division of Reckitt & Colman Inc. See response to question 15.

7. Describe in detail the nature of the activities conducted by the Company at the Site from the time the Company began operations at the Site until the present time, including:

- a. the services performed at the Site;

See response to question 5.

- b. all products which the Company manufactured, supplied, or sold which resulted from activities at the Site;

Reckitt Benckiser objects to this question as being unduly burdensome. For example, in 1982 the plant produced over 100 products, some of which were produced only a few times a year. By 1986, the number of products had increased to approximately 200 different products. Reckitt Benckiser has reviewed its Airwick environmental records to determine the names of the products that are attached to this answer as Exhibit A. To the extent there is a conflict between the list and the documents, the documents should govern absent additional information.

- c. research and development activities; and

Except for the period after the closing of operations at 111 Commerce Street when Black Flag (trademark) brand product research and development took place at 179 Commerce Street, research and development activity did not take place at the site.

- d. the time period during which those activities occurred.

See response to question 5.

8. Did your Company cease operations at the Site? If so, when? Describe the circumstances that precipitated your Company's decision to cease operations at the Site.

Yes. See response to question 5. When Reckitt & Colman Inc. purchased Airwick, Airwick withdrew from the professional cleaning product business. By 1988, that business had been sold to Ecolab, leaving the Airwick business in the consumer product business. When Boyle-Midway was acquired, Airwick manufacturing operations were consolidated at one or more of the other plants resulting in the closing of manufacturing operations in Carlstadt.

9. Did your company generate hazardous wastes at the Site, or does your company currently do so? Please describe your company's treatment, storage and/or disposal practices for any hazardous wastes generated at the Site.

Hazardous wastes were generated at the Site. Wastes were shipped off site for disposal. Attached as Exhibit B is a listing of hazardous and non-hazardous wastes for which Reckitt Benckiser has found records. This listing is a summary, from the documents reviewed, of wastes generated or materials shipped from the Site. Reckitt Benckiser makes no admission that any material listed in the summary is a hazardous waste merely because a hazardous waste manifest was utilized. Further, it may be that materials referenced in the documents have been overlooked or mischaracterized inadvertently. To the extent there is a conflict between the list and the documents, the documents should govern absent additional information.

10. Provide a list of all local, state and federal environmental permits ever granted for the Site or any part thereof (e.g., RCRA permits, NPDES permits, etc.)

Attached as Exhibit C is a listing of the local, state and federal environmental permits for which Reckitt Benckiser has found records. To the extent there is a conflict between the list and the documents, the documents should govern absent additional information. To the extent there is a conflict between the list and the documents, the documents should govern absent additional information.

11. List all hazardous substances (as defined in the "Instructions"), which were, or are, used, stored, or handled at the Site.

Reckitt Benckiser objects to this question to the extent it requires a listing as being unreasonable and burdensome. Documents produced or to be produced reference substances used at the site. However, without waiving its objection, Reckitt Benckiser submits as Exhibit D its summary, from the documents reviewed, of materials used or found at certain times at the facility. This list is not limited to hazardous substances and Reckitt Benckiser makes no admission that any material listed in the summary is a hazardous substance as defined in the Instructions. Further, it may be that materials referenced in the documents have been overlooked or mischaracterized inadvertently. To the extent there is a conflict between the list and the documents, the documents should govern absent additional information.

179 Commerce Road had three electrical transformers on a fenced cement pad that contained mineral oil and which, therefore, were assumed to contain 50 – 500 ppm of PCBs, however, there was no evidence, available information or indication of leaks, spills or releases to the environment in connection with them.

12. State when and where each substance identified in your response to Question 11 was, or is, used, stored, or handled at the Site and the volume of each substance.

See response to question 11.

13. Describe in detail how and where the hazardous wastes, industrial wastes, and hazardous substances generated, handled, treated, and stored at the Site were, or are, disposed of. If any hazardous wastes, hazardous substances, or industrial wastes were, or are, taken off-site for disposal or treatment state the names and addresses of the transporters and the disposal facility used.

Reckitt Benckiser objects to this question to the extent it seeks information relating to disposal activities outside of the Berry's Creek Study Area as being irrelevant and outside the scope of the information requests. Without waiving its objection, Reckitt Benckiser states, see response to question 9 and that there were allegations that Reckitt Benckiser were located at PJP landfill and Bayonne Barrel and Drum. At 179 Commerce Road, wastes from laboratory operations were collected and transferred to 55 gallon drums that were stored on plastic spill proof pallets in a storage room prior to delivery to a transporter for off-site disposal.

14. Who determined, or determines, where to treat, store, and/or dispose of the hazardous substances and/or hazardous wastes handled at the Site? Provide the names and current or last known addresses of any entities or individuals which made such determination.

During the period of time the undersigned was the plant manager, the plant engineer or others would propose to the plant manager for his approval a permitted transporter to remove hazardous wastes for disposal at a properly permitted facility.

15. Describe in detail the remedial activities conducted at the Site under CERCLA, the Resource Conservation and Recovery Act (RCRA), and/or laws of the State of New Jersey. Describe your Company's involvement in the remedial activities.

See response to question 5.

In April, 1985, Ciba-Geigy Limited signed an Administrative Consent Order pursuant to the New Jersey Environmental Cleanup Responsibility Act (ECRA Case # 85195) in connection with 111, 145 and 179 Commerce Road. A cleanup plan was approved by NJDEP. All tasks identified in the plans were completed and reported upon to NJDEP. Both soil sampling and groundwater monitoring were conducted. Soil excavation took place in three areas of environmental concern: 1) in connection with an underground fuel oil tank and a report of a fuel loss from a replaced tank, 2) from an area identified as a waste disposal site for soils containing fuel oil, and 3) an area of waste water disposal and an area of chemical storage tank overflow. A former dry well used for disposal and a former dry well receiving boiler room discharge were also identified as two areas of environmental concern. One monitoring well was installed near a drainage ditch that the ECRA contractor surmised could have been a source of the localized VOCs found. By letter of August 30, 1991, NJDEP determined that the 1/12/89 ECRA cleanup plan, as amended, had been implemented and completed.

In 1990, in connection with the cessation of operations at 111 and 145 Commerce Road, Reckitt & Colman Inc., submitted the required documents in connection with the New Jersey Environmental Cleanup Responsibility Act (ECRA Case # 90648) and removed two #4 fuel oil tanks, including associated affected soil, in January of 1991. A no further action determination was issued by the NJDEP on or about August 1, 1991.

In 1996, in connection with the cessation of operations at 179 Commerce Road, Reckitt & Colman Inc. submitted information pursuant to the New Jersey Industrial Site Remediation Act (ISRA Case # 96337) that identified no areas of concern and requested a no further action determination which was granted by the NJDEP by letter of October 8, 1996.

16. Identify all leaks, spills, or releases into the environment of any hazardous substances, pollutants, or contaminants that have occurred, or are occurring, at or from the Site. Specifically identify and address any leaks, spills, or releases to the Berry's Creek Study Area.

Reckitt Benckiser objects to this question and its subparts based on the vague and ambiguous definition of Berry's Creek Study Area" in the definitions. Without any admission that the "Airwick Industries Site" is in the Berry's Creek Study Area or that any materials released to the environment have reached or have had any impact on the Berry's Creek Study Area, Reckitt Benckiser answers the following with regard to its Site only.

Identify:

- a. when such releases occurred;

See response to question 5. See response to question 15. The Airwick Industries Site was part of the USEPA National Dioxin Study in 1983 – 1984 because of the use of hexachlorophene from 1974 until December of 1983. Samples were taken on site and off site. Facility samples were non-detect except for three facility sediment samples that were 8 ppt for one, 4 ppt for two, and 44 ppt for a duplicate sample. There were at times sightings of bubbles or suds as if from detergent in the parking lot or along the curbs. Sampling also took place in connection with the ECRA cases which identified areas of actual or suspected leaks, spills, or releases as noted in the response to question 15. Sampling of Site soil and groundwater was performed and submitted to NJDEP pursuant to the ECRA matters referenced in the response to question 15.

- b, how the releases occurred;

See response to question 16 (a).

- c. the amount of each hazardous substances, pollutants or contaminants so released (for substances contained in any sewage effluent from the Site, provide discharge monitoring reports or other data indicating discharge concentrations and loads, as available);

To the extent known, see response to question 16 (a).

- d. when such releases occurred;

See response to question 16 (a).

- e. where such releases entered the Berry's Creek Study Area, if applicable; and

See response to question 16 (a).

- f. the pathway by which such releases entered the Berry's Creek Study Area, including any storm sewers, pipes, or other conveyances discharging to a water body or wetland; or via surface runoff, groundwater discharge, or any spills, leaks, or disposal activities.

See response to question 16 (a).

17. Please complete the form on page 5, below. Indicate on the form whether each of the chemicals listed has ever been released from the Site to the Berry's Creek Study Area, including creeks, ditches, or other water bodies, or wetlands. Follow all additional instructions on the form. In addition, please answer Question 16, above, specifically addressing any chemicals for which you answered "yes".

See objection to question 16 which is repeated herein. Without waiving that objection, Reckitt Benckiser has utilized the form on page 5 because materials listed on the form reportedly were identified in media samples in connection with the National Dioxin Study or the ECRA Cases referenced in the response to question 15. By completing this form, Reckitt Benckiser makes no admission that the "Airwick Industries Site" is in the Berry's Creek Study Area or that any materials released to the environment have reached or have had any impact on the Berry's Creek Study Area. Because Reckitt Benckiser has not reviewed all documents on the microfilms obtained from NJDEP, there may be additional information in the microfilmed documents about materials reportedly found in media sampled at the Site but not noted on the form that was on page 5 but which is now attached as Exhibit E.

18. Identify all companies, firms, facilities, and individuals (hereafter referred to as "customers") from whom your Company obtained, or obtains, materials containing Industrial Waste as defined in Number 6 of the Definitions and whose Industrial Waste was, or is, treated, stored, handled or disposed of at the Site.

Not applicable.

For each such customer:

- a. Describe the relationship (the nature of services rendered and products purchased or sold) between your Company and the customer;
 - b. Provide Copies of any agreements or/and contracts between your Company and the customer;
 - c. Provide the name and address of each customer who sent such materials, including contact person(s) within said customer;
 - d. Provide shipping and transaction records pertaining to such Industrial Wastes sent by each customer, including but not limited to invoices, delivery receipts, receipts acknowledging payment, ledgers reflecting receipt of payment bills of lading, weight tickets, and purchase orders; and
 - e. Provide the name and address of all companies and individuals who transported, or transport; Industrial Wastes to the Site.
19. For each customer's Industrial Wastes handled, treated, stored, or disposed of at the Site, describe:
- i. the volume;
 - ii. the nature;
 - iii. chemical composition;
 - iv. color;
 - v. smell;
 - vi. physical state (e.g., solid, liquid);

- vii. any other distinctive characteristics; and
- viii. the years during which each customer's materials were handled, treated, stored, or disposed of at the Site.

Not applicable. See response to question 18.

20. Please supply any additional information or documents that may be relevant or useful to identify other companies or sources that sent industrial wastes to the Site.

None.

21. Please state the name, title and address of each individual who assisted or was consulted in the preparation of your response to this Request for Information and correlate each individual to the question on which he or she was consulted.

All of the persons listed below can be reached through Reckitt Benckiser Inc.,
1655 Valley Road, Wayne, New Jersey 07470.

James I. Hendrickson, Vice President, Planning & Logistics

Terrence J. Farrell, Esq., Associate General Counsel

Michael Pleus, Senior Environmental Specialist

Peter Rinaldi

Tom Chisari

Without waiving any objections, former employees not consulted in connection with this information request that may have additional information include:

Naresh Modhera 120 Center St, Metuchen, NJ 08840-1302

John Loftus 122 Cedar Ave, Maywood, NJ 07607

John Lipyanek 251 Ryan St., Hillsdale, NJ 07205

Rosa Cairelli 80 Summit Ave, Hackensack, NJ 07601

Felix Ruggieri) 5 Anna Rose Ct, Bloomingdale, NJ 07403

22. For each question herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the question and provide true and accurate copies of all such documents.

Reckitt Benckiser Inc. objects to this question as burdensome and unreasonable, as calling for information not relating to the alleged conditions in the Study area. Reckitt Benckiser Inc. will forward, under separate cover within two weeks of the date hereof, as authorized by Mr. Clay Monroe, Assistant Regional Counsel those documents that contain information responsive to the questions above and the microfilmed documents from the NJDEP. Those documents and microfilmed

documents obtained from the NJDEP will be produced without any admission as to the accuracy of the information contained therein and without prejudice to any position Reckitt Benckiser Inc. may take in regard to such documents.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey:

County of Passaic:

I certify under penalty of law that I have personally examined and, based upon that examination, I am familiar with the information submitted in this document (response to EPA Request for Information) and that all documents produced are true and accurate copies to the extent that they are from Reckitt Benckiser Inc. files, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete unless indicated otherwise, and that all documents from Reckitt Benckiser Inc. files to be produced are true and accurate copies unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that it is EPA's position that Reckitt Benckiser Inc. is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

JAMES HENDRICKSON

NAME (print or type)

VICE PRESIDENT LOGISTICS

TITLE (print or type)

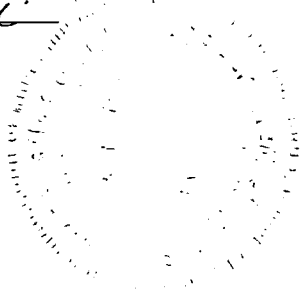

SIGNATURE

Sworn to before me this 23rd day January, 2003

Laura Simonelli

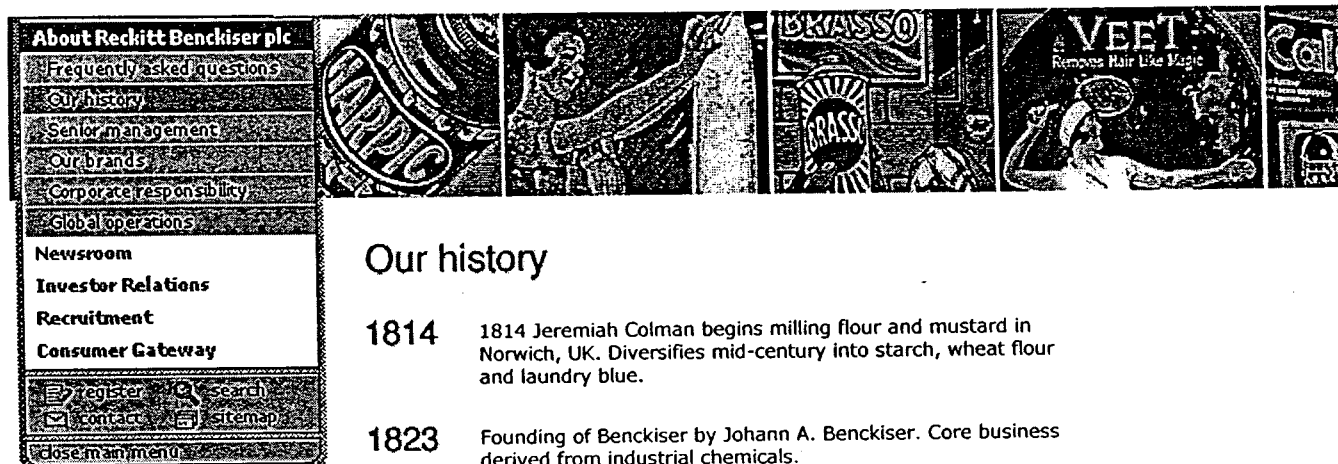
Notary Public

LAURA SIMONELLI
Notary Public of NJ
My Commission Expires
October 31, 2005





About Reckitt Benckiser plc



Our history

- 1814** 1814 Jeremiah Colman begins milling flour and mustard in Norwich, UK. Diversifies mid-century into starch, wheat flour and laundry blue.
- 1823** Founding of Benckiser by Johann A. Benckiser. Core business derived from industrial chemicals.
- 1840**
- Isaac Reckitt rents, then subsequently (in 1848) buys a starch mill in Hull.
 - Diversifies into other household products; becomes renowned for starch, washing blue and black lead for polishing
 - His four sons take over after his death
- 1886** Reckitt & Sons begins its expansion and opens businesses around the world - the first in Australia.
- 1888** Reckitt & Sons is launched on the London Stock Exchange.
- 1912** Lehn & Fink Products begins US production of Lysol - originally imported from Germany
- 1913** Joint venture set up in South America between Reckitt & Sons and J&J Colman - Atlantis Ltd. So successful that it is extended, in 1921, to cover all trading outside U.K.
- 1913** In the UK, Reckitt & Sons join the Mason brothers in forming the Chiswick Polish Company. Diversification into other branded household products continues through the war years and the Twenties.
- 1933** A major breakthrough for Reckitt & Sons, with the decision to market a germicide, Dettol, endorsed by the medical profession.
- 1938** Reckitt & Sons merge with J&J Colman to become Reckitt & Colman Ltd
- 1954** The Chiswick Polish Company merges with Reckitt & Colman Ltd.
- 1956** Benckiser diversifies into consumer goods and industrial cleaning products. In the same year, Benckiser launches Calgon water softener
- 1964** Benckiser develops and launches Calgonit Automatic Dishwashing Detergent and Quanto Fabric Softener in 1966.
- 1982** Benckiser continues its expansion into consumer goods via

acquisitions and divestitures and in 1985 acquires St. Marc S.A, France

- 1985 Reckitt & Colman buys Airwick products
- 1988 Benckiser purchases Mira Lanza Spa and Panigal Spa, Italy
- 1989 Benckiser acquires S.A. Camp Group, Spain
- 1990 Reckitt & Colman acquire Boyle-Midway, the American household products group with brands Woolite, Easy-Off, Sani-Flush, Wizard and Old English.
- 1990 Benckiser acquires worldwide branded business of Beecham Household Products in US and Canada.
- 1991 Benckiser begins expansion into Eastern Europe
- 1994 Reckitt & Colman acquires Lehn & Fink Products, including Lysol, the famous household disinfectant brand in the USA
- 1995 Reckitt & Colman sells the Colman's food business
- 1996 Benckiser continues its expansion into the Baltic countries, Belorussia, China, Israel
- 1999 Reckitt & Colman plc and Benckiser N.V. merge to become Reckitt Benckiser plc - The world no.1 in household cleaning
- 2000 In November, Reckitt Benckiser acquires Tiga Roda - an Indonesian pest control business
- 2001 March - RB acquires Oxy, a leading household business in Korea
 - April - RB disposes of (non-core) firelighter business
 - August - RB disposes of Dr. Becher, a non-core business
-  Reckitt Benckiser acquires outstanding minority interest in India and Sri Lanka



EXHIBIT A

Carlstadt – Products

Product Name	Where Manufactured
A B C	111 Commerce Rd.
A-3 Liquid	111 Commerce Rd.
A-33 Dry	111 Commerce Rd.
A-33 Dry (Improved)	111 Commerce Rd.
A-33 Liquid	111 Commerce Rd.
A-428	111 Commerce Rd.
A-456	111 Commerce Rd.
A-464	111 Commerce Rd.
A-500 Dry	111 Commerce Rd.
Acrysol 527	111 Commerce Rd.
Aerosol Dispensers	111 Commerce Rd.
Air Fresh Concentrate	111 Commerce Rd.
Air Wick Sld. Citrus CNDA F.F.	111 Commerce Rd.
Airkem A-3	111 Commerce Rd.
Airkem A-33 Dry	111 Commerce Rd.
Airkem A-33 liquid	111 Commerce Rd.
Airkem Aquinoc	111 Commerce Rd.
Airkem BacTex	111 Commerce Rd.
Airkem Entacide Insecticide	111 Commerce Rd.
Airkem F/H	111 Commerce Rd.
Airkem Food Handler	111 Commerce Rd.
Airkem Omega Concentrate	111 Commerce Rd.
Airkem Vaporizer Spray Insecticide	111 Commerce Rd.
Airwick SLD. Lemon F.F.	111 Commerce Rd.
Airwick Twins Herbal Bouquet CNDA F.F.	111 Commerce Rd.
Aquinoc	111 Commerce Rd.
Aquinoc C	111 Commerce Rd.
Asepticare	111 Commerce Rd.
AW Liq. Paraldehyde Costa Rica Splt.	111 Commerce Rd.
AW Twin Herbal F.F.	111 Commerce Rd.
AW Twin Sea Pine F.F.	111 Commerce Rd.
AW Twin Sun Citrus F.F.	111 Commerce Rd.
AWS F.F. Argentina Prt. II	111 Commerce Rd.
AWS Nat. F.F.	111 Commerce Rd.
AWS Natural Booster Int'l.	111 Commerce Rd.
Bac-Tex formulation containing Hexachlorophene G-11	111 Commerce Rd.
Bac-Tex formulation without Hexachlorophene	111 Commerce Rd.
Binaca Products	Barrell Avenue Warehouse
Binaca Products - 9/28/78 on site	111 Commerce Rd.
Chemterch Detergent/Disinfectant	111 Commerce Rd.
Citrus Sldr. CNDA F.F.	111 Commerce Rd.
Country Potpourri Stick-Up F.F.	111 Commerce Rd.
Easy Wash	111 Commerce Rd.

Exhibit A

Product Name	Where Manufactured
Entacide Insecticide Vaporizer Spray	111 Commerce Rd.
Epicare Antiseptic Lotion Soap	111 Commerce Rd.
EPOC 502 Wick Conc.	111 Commerce Rd.
Fresh Lemon Stici-Up F.F.	111 Commerce Rd.
Glamoreen Rug Shampoo	111 Commerce Rd.
Gold Lbl. SLDR F.F.	111 Commerce Rd.
Gold Sldr. CNDA F.F.	111 Commerce Rd.
Green Lbl. SLDR F.F.	111 Commerce Rd.
Halodyne Products	111 Commerce Rd. and Barrel Avenue
Heavy Duty Stick-Up F.F.	111 Commerce Rd.
Improved A-33 Dry	111 Commerce Rd.
Kelvin Fresh & Clean Stick-Up F.F.	111 Commerce Rd.
Lavender Sachet Detergent	111 Commerce Rd.
Liq. Blnd. Citrus SLDR INTER.	111 Commerce Rd.
Liq.'s Blend Gold LBL SLDR AWI	111 Commerce Rd.
Magic Mushroom	111 Commerce Rd.
Menthol Musk, Jr. F.F.	111 Commerce Rd.
Menthol Scented SLDR	111 Commerce Rd.
Mr. Bubble liquid	111 Commerce Rd.
Musketeer Jr. F.F.	111 Commerce Rd.
Neutros 105	111 Commerce Rd.
Neutros 109	111 Commerce Rd.
Neutros 140	111 Commerce Rd.
Neutros 149	111 Commerce Rd.
Neutros 191	111 Commerce Rd.
Neutros 626	111 Commerce Rd.
Neutros 675	111 Commerce Rd.
Oil Emuls. Spec. 105 Dap. Splt.	111 Commerce Rd.
Omega Concentrate	111 Commerce Rd.
OSMIX 27	111 Commerce Rd.
Pine Oil	111 Commerce Rd.
Premeasured A-33 Dry	111 Commerce Rd.
Prod. 75 Venezuela Splt.	111 Commerce Rd.
Proforce Dust Subdue	111 Commerce Rd.
Proforce Safety Solvent	111 Commerce Rd.
PT II Liq. Gls. Argentina	111 Commerce Rd.
Rain Fresh	111 Commerce Rd.
SLDR Citrus F.F.	111 Commerce Rd.
SLDR Silver F.F.	111 Commerce Rd.
Snowy Bleach liquid	111 Commerce Rd.
Spec. 191 Conc. Sap.	111 Commerce Rd.
Spec. 6471	111 Commerce Rd.
Spicy Potpourri Stick-Up F.F.	111 Commerce Rd.

Exhibit A

Product Name	Where Manufactured
Stick Up Air Freshener	111 Commerce Rd.
Stick ups/Magic Mushroom premix	111 Commerce Rd.
Super Kiwa Kleener/Touchdown	111 Commerce Rd.
Surgical Drug Preparations - Decongestant – solid air freshener containing menthol	111 Commerce Rd.
Tri-Kem	111 Commerce Rd.
Trimox	111 Commerce Rd.

ENVIRONMENTAL PERMITS/CERTIFICATES
issued to Airwick Industries Inc. or Reckitt and Colman Inc. for Carlstadt, N.J. facility

NJ Stack No.	NJDEP Air Pollution Control Permit/Certificate issued to Airwick	No. of Stacks	No. of Sources	Approval Date on Permit/Certificate	Effective & Expiration Dates on Permit/Certificate	Equipment
1	16718	3	8	10/10/74	9/12/74-12/10/74 (temporary); 10/10/74-10/10/79; 10/10/79-10/10/89	Injection molding of polyethylene & polypropylene (8 machines).
1	85418 (replaces 16718) (179 Commerce Rd.)	3	1	7/23/88	10/21/88-1/13/95	Addition of an injection blow molding machine, for total of 9 machines.
2	16433 (179 Commerce Rd.)	1	1	10/10/74	10/10/74-10/10/79; 10/10/79-10/10/94	Polypropylene storage tank/silo #1.
3	17503 (179 Commerce Rd.)	1	1	2/25/75	12/2/74-3/2/75 (temporary); 2/25/75-2/25/80; 2/25/80-2/25/90	Polypropylene storage tank/silo #2.
4	17875	1	1	3/17/75	1/1/75-4/1/75 (temporary); 3/17/75-3/17/80; 3/17/80-3/17/90	Dry Mix Room-Dust Collector Torit. Process equipment consists of: blender, hoppers, fill/seal machines, package opening machines.
4	70177 (revised by 83143 below, as noted in 2/18/88 permit application for 83143)	?	?	?	Expiration Date: 12/17/1989	Dust Collector Torit 84.
5	52003 (revised by 80775 below)	1	17	12/27/82	12/27/82-6/18/89	#1 Liquid Mix Room-Ventilation System.
5	80775 (replaces 52003 above)	1	14	12/14/87	12/14/87-11/27/90 (temporary)	See above.
6	62856	1	1	2/20/83	2/20/83-5/14/89	Vacuum system - dry powder & package.

ENVIRONMENTAL PERMITS/CERTIFICATES
issued to Airwick Industries Inc. or Reckitt and Colman Inc. for Carlstadt, N.J. facility

NJ Stack No.	NJDEP Air Pollution Control Permit/Cer- tificate issued to Airwick	No. of Stacks	No. of Sources	Approval Date on Per- mit/Cer- tificate	Effective & Ex- piration Dates on Permit/Certificate	Equipment
7	72679	1	1	5/30/85	5/30/85-5/30/95	Ethanol storage tank vent.
8	77700 (revised by 83143 below) [transferred from Gold Seal Co. to Airwick by Certificate 70175]	?	?	2/27/87	2/27/87-8/14/89	Dust Collector-Stack Torit #124- A.
9	77701 (revised by 83143 below) [transferred from Gold Seal Co. to Airwick by Certificate 70176]	1	1	2/27/87	2/27/87-2/27/92	Dust Collector-Stack Torit #124- B.
10	77702 [transferred from Gold Seal Co. to Airwick by Certificate 66366]	1	1	2/27/87	2/27/87-2/27/92	Hydrogen peroxide storage tank.
11	77784	1	1	3/31/87	3/31/87-3/31/92	Bubble bath concentrate storage tank.

ENVIRONMENTAL PERMITS/CERTIFICATES
issued to Airwick Industries Inc. or Reckitt and Colman Inc. for Carlstadt, N.J. facility

NJ Stack No.	NJDEP Air Pollution Control Permit/Certificate issued to Airwick	No. of Stacks	No. of Sources	Approval Date on Permit/Certificate	Effective & Expiration Dates on Permit/Certificate	Equipment
12	77785 [revised by 82197 below according to NJDEP Air Pollution Control status sheet]	1	1	3/31/87	3/31/87-3/31/92	Softener concentrate storage tank.
13	79054 [revised by 82198 below according to NJDEP Air Pollution Control status sheet]	1	1	6/18/87	9/16/87-6/11/93	Softener concentrate storage tank.
14	79107	1	1	8/20/87	8/20/87-8/20/92	Mushroom storage tank #1.
15	79108	1	1	8/20/87	8/20/87-8/20/92	Mushroom storage tank #2.
16	82197 [replaces 77785 above according to NJDEP Air Pollution Control status sheet]	1	1	3/15/88	3/15/88-12/4/94	Softener concentrate storage tank #55.
17	82198 [replaces 79054 above according to NJDEP Air Pollution Control status sheet]	1	1	3/15/88	3/15/88-12/4/94	Softener concentrate storage tank #56.
18	83143 (2/18/88 permit application notes previous certificates 70177, 77700, 77701 above)	1	1	4/7/88	4/7/88-12/27/94	Torit #1 Stack. New control apparatus, a dust collector, on existing equipment.

ENVIRONMENTAL PERMITS/CERTIFICATES
issued to Airwick Industries Inc. or Reckitt and Colman Inc. for Carlstadt, N.J. facility

NJ Stack No.	NJDEP Air Pollution Control Permit/Certificate issued to Airwick	No. of Stacks	No. of Sources	Approval Date on Permit/Certificate	Effective & Expiration Dates on Permit/Certificate	Equipment
19	87412	1	1	9/27/88	12/26/88-12/20/94	Powder room vacuum system.

PERMITS OTHER
THAN NJDEP AIR
POLLUTION
CONTROL

PERMIT NO.	FROM	TO	ISSUED		TYPE	NATURE OF DISCHARGE
	NJPDES Industrial General Permit #NJ0088315, SWG#A-004295	Eff. Date on Permit: 5/6/93	Expiration on Permit: 11/1/97; Reckitt & Colman Request for Termination as of 2/1/97	Reckitt & Colman Inc. for 179 Commerce Rd.	Authorization to Discharge Stormwater to Surface Water.	
	Wastewater Discharge Permit #88-193* (Note: *There is also a BCUA Sewer Discharge Permit Application/Wastewater Questionnaire sent 5/5/95 to BCUA by Reckitt & Colman for 179 Commerce Rd.)	Discharge period to: at least 8/16/90 (date of SES submitted to NJDEP indicating #88-193 currently active)			Wastewater Discharge for POTW operated by Bergen County Utilities Authority (BCUA), Mehrof Rd., Little Ferry, NJ 07643.	
	Permit #0066664	?	?	?	?	Sanitary/Industrial

NWK2:1012561.v3

EXHIBIT E

Request for Information Regarding Chemical Releases to the Berry's Creek Study Area

* * *

Instructions: As instructed in Question 17, please complete this form by marking the appropriate spaces. Indicate whether each of the chemicals listed has ever been released from the Site to the Berry's Creek Study Area, including creeks, ditches, or other water bodies, or wetlands. Follow additional instructions below. Return the completed form along with your other responses to the Request for Information in the Matter of the Berry's Creek Study Area, Bergen County, New Jersey. N/A signifies no information available.

	Yes	No	N/A
acenaphthene			
acenaphthylene			
anthracene			
* aluminum			
* antimony			
* arsenic			
benz(a)anthracene			
benzene			
benzo(a)pyrene			
benzo(b)fluoranthene			
benzo(g,h,i)perylene			
benzo(k)fluoranthene			
bis(2-ethylhexyl)phthalate			
butyl benzyl phthalate			
* cadmium			
* chlorinated dibenzo-p-dioxins (if "yes", please list specific dioxin compounds on a separate sheet)			
chlorinated dibenzofurans (if "yes", please list specific compounds on a separate sheet)			
* chlorobenzene			
* chloroform			
* chromium			
chrysene			
* copper			
* cyanide			
dibenz(a,h)anthracene			
* dichlorobenzene			
1,2-dichlorobenzene			
di-n-butyl phthalate			
1,2-dichlorobenzene			
1,2-dichloroethane			
dieldrin			
di-n-octyl phthalate			
* ethylbenzene			
fluoranthene			

	Yes	No	N/A
fluorene			
hexachlorobenzene			
indeno(1,2,3-cd)pyrene			
lead			
* manganese			
* mercury			
methylene chloride			
* methyl ethyl ketone			
* methyl mercury			
2-methylnaphthalene			
* naphthalene			
* nickel			
pentachlorophenol			
* petroleum hydrocarbons			
* phenanthrene			
* phenol			
polychlorinated biphenyls (if "yes" please list specific congeners and aroclors on a separate sheet)			
polycyclic aromatic hydrocarbons (if "yes" please list specific compounds on a separate sheet, if not listed on this page)			
pyrene			
* selenium			
* silver			
1,1,2,2-tetrachloroethane			
tetrachloroethylene			
* thallium			
* toluene			
1,1,2,2-tetrachloroethylene			
1,1,1-trichloroethane			
* trichloroethylene			
* vinyl chloride			
* xylene			
* zinc			

* See objection to question 17. Without waiving that objection which is repeated herein and without admission that the "Airwick Industries Site" is in the Barry's Creek Study Area or that any materials released to the environment have reached or have had any impact on the Berry's Creek Study Area, Reckitt Benckiser has noted with an asterisk those materials listed on this form that reportedly were identified in media samples at the Site. See response to question 17 for additional information. The specific dioxin compound noted is 2,3,7,8-tetrachlorodibenzo-p-dioxin.

Michael Pleus, Senior Environmental Affairs Specialist
Name of person completing this form

Reckitt Benckiser Inc.
Company

Airwick Industries
Site (as defined in the
"Instructions")